

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

Restoration Action, Inc.  
1901 Butterfield Road, Suite 120  
Downers Grove, Illinois 60515

Plaintiff,

V.

Center for American Restoration, Inc.  
America Restoration Action  
Russell Vought,  
912 South Quincy Street  
Arlington, Virginia 22204

Defendants.

Civil Action No. 1:21-cv-00400

## PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff, Restoration Action, Inc., (“Plaintiff” or “Restoration Action”), by and through its undersigned counsel, brings this action against Defendants Russell Vought, America Restoration Action, and Center for American Restoration, Inc. (“Defendants”) pursuant to Fed. R. Civ. P. 65(b) of the Federal Rules of Civil Procedure, and respectfully moves this Court for a Preliminary Injunction Order enjoining and restraining Defendants, and any related organizations or companies (including parents, officers, directors, agents, owners, employees, representatives, and attorneys and all others acting under, or in concert with, any of them), from: (a) using the name “Restoration” or any of Plaintiff’s names or marks as an imitation thereof in connection with Defendants’ services; (b) using Plaintiff’s names or marks or any variations in connection with promotion of its services; (c) using the domain name “<https://www.americanrestorationcenter.com>” or any domain name that includes the word “Restoration”; (d) unfairly competing with Restoration Action, Inc. in any manner whatsoever.

The reasons and basis for this Motion, and the order sought by Plaintiff, are set forth in Plaintiff's Memorandum in support of this Motion, filed herewith.

WHEREFORE, Plaintiff prays that this Court grant its Motion for Preliminary Injunction.

Respectfully submitted,

RESTORATION ACTION, INC.

/s/ Thomas W. Brooke

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 6, 2021, a true and correct copy of the foregoing was served, by email and first class mail, postage prepaid, on the following:

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/s/ Thomas W. Brooke  
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